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15 Attorneys for Plaintiff EUFEMIA GUILLEN

16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 \*\*\*

19 EUFEMIA GUILLEN, )  
20 vs. Plaintiff, ) Case No.: 3:20-cv-00317-MMD-CSD  
21 B.J.C.R. L.L.C., a Nevada Limited Liability )  
22 Company; B.J.H.S., LLC., a Nevada Limited )  
23 Liability Company; R.C.S.J., LLC, a Nevada ) **PLAINTIFF'S MOTION FOR**  
24 Limited Liability Company; Dhilan One L.L.C., a ) **EXTENSION OF TIME TO FILE**  
25 Nevada Limited Liability Company; CHAMPAK ) **REPLY TO OPPPOSITION TO**  
26 LAL, an Individual; and BHARAT B. LAL, an ) **COUNTERMOTION FOR**  
27 Individual, ) **PROTECTIVE ORDER UNDER**  
28 Defendants. ) **FRCP RULE 26(c)**  
29 ) **[FIRST REQUEST]**

30 Pursuant to LR IA 6-1 Plaintiff EUFEMIA GUILLEN ("Plaintiff"), by and through her  
31 undersigned counsel, hereby moves to extend time to file a Reply to Opposition to her  
32 Countermotion for Protective Order filed February 22, 2022 (ECF No. 58). Defendants filed  
33 their Opposition on March 8, 2022 (ECF No. 62 and 63). That makes the Reply to Opposition  
34 due on March 15, 2022. Plaintiff is seeking an extension to Friday, March 25, 2022 for the  
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1 reasons set forth herein and this is the first request for an extension of this deadline. The  
2 Plaintiff seeks this extension on the following grounds:

- 3 1. On March 4, 2022 Plaintiff's undersigned counsel James P. Kemp, Esq. left on a  
4 long-planned two week vacation including an ocean cruise that runs from March  
5 5, 2022 through March 17, 2022. This vacation is to celebrate counsel's 25<sup>th</sup>  
6 wedding anniversary with his wife which was on March 8. Thus the Defendants'  
7 Opposition to the Countermotion for Protective Order relating to Plaintiff's  
8 immigration records was filed while counsel was onboard the ship celebrating his  
9 milestone Silver Anniversary with his wife;
- 10 2. Plaintiff's undersigned counsel is the primary attorney working on the  
11 countermotion briefing and is the attorney that filed the countermotion on  
12 February 22. Co-counsel Ms. Gallagher has not worked as extensively on this  
13 issue;
- 14 3. While undersigned counsel has been away, his ailing 89 year old mother's health  
15 took a turn for the worse and she has been placed in hospice care and given a  
16 short time to live. Dealing with these family matters has also taken time and  
17 attention for Mr. Kemp;
- 18 4. Defense counsel Sandra Ketner was contacted by Ms. Gallagher to ask about a  
19 one-week extension and Ms. Ketner declined to agree stating that she would only  
20 agree to an extension to March 18. Mr. Kemp emailed Ms. Ketner on March 15,  
21 2022 to ask her to reconsider granting an extension to March 25 for the reasons  
22 set forth above. As of this writing Ms. Ketner has not responded to this request.  
23 Plaintiff's counsel pointed out that all he was asking for was the one week period  
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1 that he would ordinarily have had were it not for his vacation as he returns to the  
2 office on Friday, March 18, and so an extension to Friday, March 25 would  
3 simply give him the time that he lost due to his being away on vacation.  
4

5 Accordingly, the Plaintiff requests that the court grant this motion and extend the time for  
6 Plaintiff to file a Reply to the Opposition to Countermotion cited above through and including  
7 March 25, 2022.

8 Respectfully submitted,

9  
10 DATED 15<sup>th</sup> day of March, 2022.

/s/ James P. Kemp

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Attorney for Plaintiff

15  
16 **ORDER**

17 IT IS SO ORDERED.

18   
19 THE HONORABLE CRAIG S. DENNEY  
20 UNITED STATES MAGISTRATE JUDGE

21 Dated: March 16, 2022.